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Attorneys for John Kevin Moore

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
GREAT FALLS DIVISION**

CHRISTOPHER TRAVIS, individually)
and derivatively on behalf of MILK)
RIVER HUNTING PRESERVE, LLC,)
a dissolved Montana Limited Liability)
Company,)

Plaintiff,)

vs.)

JOHN KEVIN MOORE, et. al.,)

Defendants.)

Cause No. CV-22-74-GF-BMM

**DEFENDANT'S RESPONSES TO PLAINTIFFS' FIRST SET OF
REQUESTS FOR ADMISSION**

Defendant John Kevin Moore's Responses to Plaintiffs' Requests for Admission - 1



any portion of the insurance premiums concerning the real property owned by Milk River Hunting Preserve since June 12, 2017.

4. Admit that you have not paid any portion of the electricity or water bills concerning the real property owned by Milk River Hunting Preserve since at least October of 2016.

RESPONSE: Denied. However, it is admitted that Mr. Moore has not paid any portion of the electricity or water bills concerning the real property owned by Milk River Hunting Preserve since June 12, 2017.

5. Admit that Milk River Hunting Preserve, LLC was administratively dissolved by the Montana Secretary of State more than five years ago.

RESPONSE: Admitted.

6. Admit that you entered into a five-year lease agreement on behalf of Milk River Hunting Preserve with Russ Gilbertson for his use of certain real property owned by Milk River Hunting Preserve, LLC.

RESPONSE: Admitted.

7. Admit that Russ Gilbertson paid \$25,000.00 for the lease agreement discussed in Request Admission No. 6.

RESPONSE: Admitted.

8. Admit that the \$25,000.00 paid by Russ Gilbertson for the lease agreement discussed in Request Admission No. 6 was paid directly to an attorney

representing you with respect to the charges brought against you by the United States Department of Justice and/or the Montana Commissioner of Securities and Insurance.

RESPONSE: Denied. The amount referenced was paid in or about September or October 2016 by wire transfer to Mr. Moore's attorney Channing Hartelius. At that time, there were no charges pending by the U.S. Department of Justice or the Montana Commissioner of Securities and Insurance.

DATED this 1st day of June, 2023.

/s/ Alexander L. Roots
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